

# BPA Policy 236-260

## Email Management

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## 1. Purpose & Background

This policy provides information governance policies and guidance for users of the Bonneville Power Administration (BPA) email system.

BPA uses the National Archives and Records Administration (NARA) Capstone approach to manage email, which allows Federal agencies to categorize and schedule email based on the work and/or position of the email account owner as opposed to the content of the email.

## 2. Policy Owner

The Executive Vice President of Compliance, Audit, Risk Management and Equal Employment Opportunity (EVP CAR) has overall responsibility for this policy. The Agency Records Officer (ARO) within Information Governance develops, implements, and manages this policy on behalf of the EVP CAR.

## 3. Applicability

- A. This policy sets requirements for the use of BPA's email system.
- B. In addition to the information governance policies of this chapter, all email users are responsible for adhering to BPA's policies on Business Use of Information Technology Services (see BPA Manual 1110 Business Use of BPA Information Technology Services) and Cyber Security requirements.

## 4. Terms & Definitions

- A. As used in this policy, the following terms and definitions apply:
  - 1. **Agency File Plan:** The systematic method of identifying specific types of records that are maintained, series descriptions, and disposition authorities. The Agency File Plan maps to the Large Aggregate Flexible Schedule approved by NARA for BPA.
  - 2. **Capstone:** A means of managing and scheduling email content where final disposition is determined by the role or the position of the account user rather than the content of each individual email, tasks, or calendar event.
  - 3. **Consolidated Archive (CA):** A module of the Discovery Core system used to preserve Exchange Journaling content for eDiscovery, the Freedom of Information Act (FOIA), regulatory audits and High Level Official (HLO) Capstone only.
  - 4. **Content Manager:** A module of the Discovery Core system; a repository for records and their metadata.
  - 5. **Electronic Information System (EIS):** Computerized/digital means for collecting, organizing, and categorizing information to facilitate its preservation, retrieval, use, and disposition.

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6. **Journaling:** The process of copying all email communications within Exchange in real time for the purposes of regulatory compliance and data retention for eDiscovery, FOIA, regulatory audits, and HLO Capstone only.
7. **Federal Record:** See Records.
8. **High Level Official (HLO):** A term used by the DOE Records Management Program Office to refer to key decision makers whose e-mails are retained permanently. At BPA, HLO are: Executive Office Employees (Administrator, Deputy Administrator, Chief Operating Officer, Chief Administrative Officer, Chief Financial Officer, and General Counsel); Executive Vice Presidents of Compliance, Audit, Risk Management and Equal Employment Opportunity; Environment, Fish & Wildlife; and Information Technology & Chief Information Officer; and Senior Vice Presidents of Power Services and Transmission Services.
9. **Information Asset:** Recorded information that has business value for BPA and must be managed throughout its lifecycle.
10. **Office of Record:** The organization that, by definition of its mission or function, has primary responsibility for maintenance and retention of the record.
11. **Records:** Includes all [recorded information](#), regardless of form or characteristics, made or received by a Federal agency under Federal law or in connection with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the United States Government or because of the informational value of data in them; and does not include—library and museum material made or acquired and preserved solely for reference or exhibition purposes; or duplicate copies of [records](#) preserved only for convenience. See 44 USC § 3301.
12. **Transitory Records:** Records required only for a short time (generally less than 180 days) and that are not required to meet legal or fiscal obligations, or to initiate, sustain, evaluate, or provide evidence of decision-making.

B. As used in this policy, the following acronyms apply:

1. **CA:** Consolidated Archive
2. **EIS:** Electronic Information Systems
3. **FOIA:** Freedom of Information Act
4. **HLO:** High Level Official
6. **IGLM:** Information Governance and Lifecycle Management
7. **NARA:** National Archives and Records Administration
8. **SEIS:** Structured Electronic Information System

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## 5. Policy

A. BPA will manage all email content using NARA’s Capstone approach with the following two retention roles:

1. A 7-year retention period for the majority of BPA’s workforce:
  - a) The disposition for these emails is temporary. The default retention for these mailboxes is 7 years from the sent/received date, and then destroy. This is applicable to all user mailboxes and includes attachments, calendars, instant messages, and voicemail recordings.
2. A 15-year retention period for High Level Officials (HLOs) and their Executive Associates:
  - a) The disposition for these emails is permanent. The default retention for these mailboxes is 15 years from the sent/received date, and then removed from Outlook. This is applicable to all user mailboxes and includes attachments, calendars, instant messages and voicemail recordings. This also includes those officials in an acting capacity for longer than 60 days.
  - b) When the HLO is no longer in the position, the journaling copy housed in CA will be copied from CA and moved into Content Manager (CM) for the 15-year retention period following the cutoff of date send/received.
  - c) At the end of the retention period, the journaling copy housed in CM as described below in section 8.D are transferred to NARA. Once NARA has verified the receipt, the local copies used for transfer are deleted. This is applicable to all user mailboxes and includes attachments, calendars, instant messages and voicemail recordings.

B. Use of Personal/Non-Agency Email Accounts to Conduct Agency Business

BPA does not allow the use of personal/non-agency email accounts to conduct agency business. However, if exceptional circumstances require the use of personal/non-agency email accounts to conduct agency business, users must “cc” their BPA issued email account to ensure the email is captured and managed according to section 5.A above.

C. Shared Mailboxes

Shared mailboxes (such as HELPDESK or HRHelp) are used by organizations as a message center to facilitate support services to BPA personnel. The manager of the organization is responsible for the content of the shared mailbox. Shared mailboxes must comply with the retention rules set under section 5.A above.

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#### D. Transitory Records

Emails that are transitory records, with no business value, may be deleted immediately.

#### E. Mailbox Storage Quota

IT assigns a standard storage quota for mailboxes. Personnel must actively manage their email to ensure that no records are deleted as a result of exceeding their storage quota.

#### F. Moving Email Outside of the Email System

1. Emails that have a unique value to a business process that is subject based (not role based) and are covered by BPA's approved retention schedule with a retention longer than their Capstone retention, must be moved out of the email system and into a location that maintains the email in its original or native format, with metadata intact and appropriate integrity, security, and availability controls. See BPA Policy 236-13, *Overview of Information Systems* for appropriate storage locations. The Outlook Message Format .msg is an approved native format. Users who want to use a different format must receive approval from the IGLM team and the Cyber Forensics and Intelligence Analysis team. Non-.msg formats must meet minimum requirements for metadata retention, including but not limited to retaining:

- a) the name/email address of the sender,
- b) the names/email addresses of all recipients,
- c) the date the message was sent, and
- d) the subject line of the message.

#### G. Unmanaged System Mailboxes:

Many BPA systems provide automated email notifications to users (often referred to as broadcast emails), that aid in the efficiency of administrative processes.

Unmanaged system mailboxes will comply with the retention rules set under section 5.A as well as storage quota set by IT.

## 6. Policy Exceptions

#### A. Capstone Retention Roles:

1. If a user or group of users has a business need that requires email records to be retained as permanent records a formal exception request can be requested following the steps below:
  - a) **Role:** The user must demonstrate that the emails have a unique value to a business process that is role based, not subject based. (See section 5.F above to

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manage emails that are subject based with retention needs longer than the assigned Capstone retention role.)

- b) **Permanent Records:** The user must demonstrate their role or position at BPA predominately creates permanent records related to mission critical functions, policy decisions and/or are of historical significance. This is accomplished by identifying file code(s) in the Agency File Plan for which their organization is listed as Office of Record and identifying the business process on their organization’s Information Asset Plan.
- c) **Access:** The user must demonstrate that the emails are not needed by others to perform their job function.
- d) **Approval:** The ARO will approve/deny all requests for exception to the assigned Capstone retention roles, however NARA makes the final determination. If approved by the ARO, the documentation provided above will be submitted to NARA for consideration.

**B. Legal Holds:**

1. As provided for in BPA Manual 1110 Business Use of BPA Information Technology Services, there is no expectation of privacy when using the BPA email system, even for limited personal use allowed under the policy. Emails are records and the property of BPA. They may be required to be preserved and produced for business purposes, compliance, litigation, internal audits, and Inspector General or other audits. Emails being maintained in any Electronic Information System (EIS) may have a legal hold placed on them under the authority of the Office of General Counsel (OGC). Legal holds prevent loss through the deletion (including the auto-delete function) or alteration of emails. Mailboxes on legal hold retain email in the mailbox and the deleted items folder (or other administrative database) until the hold is removed.
2. Per BPA Policy 220-3, *Discovery and Legal Holds*, legal holds are placed by Cyber Forensics and Intelligence Analysis team (“Cyber Forensics”) under the authority of OGC. The user will continue to see the assigned Capstone policy in Outlook, but those emails will be held on the server. The Cyber Forensics and Intelligence Analysis team may copy emails for review and production purposes.
3. All Outlook content retained through journaling is a copy and is used to fulfill BPA’s obligation to appropriately maintain record material for responding to FOIA or litigation requests. Personnel using Outlook will not have access to journaling content and must manage and maintain Outlook content for continued access in support of business functions.
4. In addition to placing legal holds on mailboxes and journaling, OGC and Cyber Forensics may also direct that existing backup tapes of the email system be held and maintained.

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## 7. Responsibilities

- A. **Email Users:** Both senders and receivers are responsible for identifying emails that need to be retained longer than the mailbox’s assigned Capstone retention and moving them out of the email system into an appropriate storage location as defined in BPA Policy 236-13, *Overview of Electronic Information Systems*.
- B. **Shared Mailbox Owners:** The owner of the shared mailbox is responsible for ensuring compliance with retention periods, access and life-cycle. All users of these Exchange resources are responsible for identifying emails that need to be retained longer than the mailbox’s assigned Capstone retention and moving them out of the email system into an appropriate storage location as defined in BPA Policy 236-13, *Overview of Electronic Information Systems*. Additionally, shared mailbox owners must provide notice to the Unified Communications team when the mailboxes are no longer required.
- C. **IT Platform Services – Unified Communications:** The Unified Communications team (commonly referred to as the Email/Exchange team) is responsible for implementing the IGLM requirements of this policy including Capstone retention roles; providing regular reports for compliance purposes; and managing the email environment in accordance with the service level agreements that have been developed to ensure appropriate information management standards. The Unified Communications manager reviews and approves/denies requests to increase the size limits for the inbox. The Unified Communications team shall implement legal searches and holds as required by the Cyber Forensics team and OGC. The Unified Communications team may assign to the Cyber Forensics team those technical capabilities necessary to conduct legal searches and holds.
- D. **IGLM Team:** The IGLM team is responsible for developing policy and guidance on managing information assets in email format both within and outside of the BPA email system; training on the policy contained in this and other BPA policy as well as Federal regulations; monitoring and auditing use of the BPA email system for compliance; and supporting OGC and the Cyber Forensics team in conducting legal searches, applying legal holds, and addressing e-discovery requirements.
- E. **Agency Records Officer (ARO):** The ARO manages the IGLM program for policy, training, and compliance responsibilities. The ARO reviews and approves/denies request for exceptions to policies in this chapter including Capstone role assignments, alternative formats, and storage of information assets in email format. The ARO is also responsible for submission and gaining approval of NARA form NA-1005, *Verification for Implementing GRS 6.1*.
- F. **Cyber Forensics and Intelligence Analysis team (Cyber Forensics):** The Cyber Forensics team within the Cyber Security Office is responsible for coordinating with OGC on e-discovery activities including legal searches and holds; directing and

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applying legal holds for the email system in coordination with the Unified Communications team; and collecting and managing materials from the email system through journaling or otherwise that may be relevant to litigation, audits, investigations and other similar forensic activities. As the organization assigned full administrative permissions for CA, the Cyber Forensics team is responsible for disposition and moving Capstone permanent content from CA to IGLM control to transfer legal ownership to NARA.

- G. **Cyber Security Office:** The Cyber Security Office is responsible for development, issuance, and enforcement of policy relating to BPA IT Equipment. Cyber Security’s governance is based on Federal laws, regulations, DOE Orders and BPA guidelines including BPA Manual 1110 Business Use of BPA Information Technology Services.
- H. **Office of General Counsel (OGC):** OGC has primary responsibility for e-discovery, including directing the scope of legal holds and searches and coordinating with the Cyber Forensics team to identify preserve and collect electronically stored information that may be relevant to litigation, investigations or other e-discovery activities. The OGC maintains the list of active litigation matters as well as lists of those Exchange users and resources that are on legal hold. This responsibility cannot be delegated to the Email/Exchange team.
- I. **Human Resources (Classification and Position Management):** The Recruitment and Classification organization provides current rosters of HLO employees in both the position of record and acting capacities per the position description and position numbers upon regular request from the IGLM team. Appendix A of this policy provides the current roster.
- J. **National Archives and Records Administration (NARA):** Reviews and approves/denies BPA’s submission of NARA form NA-1005, *Verification for Implementing GRS 6.1* as well as exceptions to the assigned Capstone retention role for individual users or groups of users.

## 8. Standards & Procedures

- A. The Information Technology organization assigns individual user names, also known as email addresses, for primary mailboxes. Alias user names, “sent as” capabilities or non-primary mailboxes are not permitted except as provided in section 5.C of this policy. The standard Sent on Behalf of feature is allowed. The Unified Communications team maintains a list of current users and the Sent on Behalf of designees.
- B. Per NARA Regulation 36 CFR 1236.22, BPA email messages must be retrievable in their original format with all metadata intact and retain the following metadata regardless of the system in which they are maintained (i.e. primary mailbox folders or other EIS):
  1. Names of senders and all addressee(s);

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2. Date/time stamp the message was sent (or received); and
  3. Attachments that are integral to the message.
- C. Emails must be searchable based on the required metadata. The email system shall index the email and associated files for future search and retrieval.
- D. Journalized copies of Outlook content are maintained in CM for the retention periods as described in sections 5.A above. Email with permanent retention are moved to IGLM control after the HLO is no longer in the position and retained for 15 years after the sent/received date and then legal ownership is transferred to NARA. To the extent possible, permanent email accounts will be culled to remove transitory and personal email.
- E. On a quarterly basis, the IGLM team reviews the roster of position descriptions and position numbers as provided by the Recruitment and Classification organization and identifies any changes to individuals in HLO Executive Associate positions or changes to the positions themselves and notifies the Cyber Forensics team, which then makes necessary adjustments to capture emails under Capstone.

## 9. Performance & Monitoring

- A. The IGLM team within Information Governance, Cyber Forensics, and the Unified Communications team are responsible for performance standards and monitoring plans contained in this policy.
1. Performance Standards
    - a) The email system technical performance standards are maintained by the Unified Communications team.
    - b) 99% of all mailboxes should have the appropriate retention policy applied.
    - c) 99% of all accounts in CA should have the appropriate retention policy applied.
    - d) 99% of mailboxes that are required to be on litigation hold have the appropriate hold(s) applied.
  2. Monitoring Plans
    - a) Cyber Forensics provides a quarterly report to the IGLM team on:
      - i) Accounts in CA with a 15 and 7 year retention policy.
      - ii) Disposition activity in CA.
    - b) Human Resources – Classification & Position Management provides a quarterly report to the IGLM team on:
      - i) HLO employees both in the position of record and acting capacities per the position description and position number.

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- ii) Executive Associates both in the position of record and acting capacities per the position description and position number.
- c) Unified Communications team provides quarterly reports to the IGLM team on:
  - i) Retention policies assigned by account

**10. Authorities & References**

- A. 44 USC 2904, 3101, 3102, 3105: The Federal Records Act
- B. 36 CFR 1235.44 – 50: Requirements for transfer of electronic permanent records to NARA
- C. 36 CFR 1236.10 – 14: Records Management and Preservation Considerations for Designing and Implementing Electronic Information Systems
- D. 36 CFR 1236.20 – 28: Subpart C – Additional Requirements for Electronic Records
- E. OMB Circular A-130, Managing Information as a Strategic Resources
- F. OMB Memorandum M-19-21, Transition to Electronic Records
- G. BPA Manual 1110 Business Use of BPA Information Technology Services
- H. BPA Policy 220-3, Discovery and Legal Holds
- I. NARA Bulletin 2013-02, Guidance on a New Approach to Managing Email Records
- J. NARA’s General Records Schedule 6.1 Email Managed Under a Capstone Approach
- K. NARA’s General Records Schedule 5.2 Transitory and Intermediary Records
- L. DOE O365 Playbook for Exchange Online

**11. Review**

The IGLM team within Information Governance is the responsible organization for managing this policy’s review. This policy is reviewed on a 3-year cycle beginning in 2015. All IGLM policies are reviewed when revisions are introduced to BPA Policy 236-1, Information Governance and Lifecycle Management or other policies governing information management. Editorial updates to the policy and attachments may be made without Information Governance Oversight Team and Policy Working Group review and approval.

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## 12. Revision History

This chart contains a history of the revisions and reviews made to this document.

Version Number	Issue Date	Brief Description of Change or Review
1.0	09/30/1999	Electronic Mail (Email) policy published
2.0	09/03/2013	IGLM Manual Chapter 260 published - original chapter replacing Electronic Mail policy
3.0	05/01/2015	Migration to new BPA policy format. Includes updates re: use of personal email.
4.0	12/09/2016	Revision to update legal holds on mailboxes/journaling capabilities, IGLM Program Organization change from Agency Compliance & Governance to Information Governance, update the definition of a short-term record and migration to the new BPA policy format, cmfrost.
4.1	02/15/2018	Revision to § 5.J clarifies that Public Folders will be read-only, starting April 2, 2018. As previously written, it was unclear when this would occur. This is a minor revision. The effective date remains unchanged.
4.2	07/14/2021	Revision to capture changes made to the email system as part of the upgrade to O365 Exchange Online and to consolidate BPA's two email policies and retire BPA Policy 236-261, <i>SES Email Content Management Through Capstone</i> .

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# Appendix A: HLO Position Description Roster

As of 06/25/2021:

ORG		Title	Position #	PD	PP	Series
A	Executive Office	Administrator and Chief Executive Officer	'00000159	J00159	ES	'0340
C	Compliance, Audit and Risk Management	Executive VP, Compliance and Risk Management	'00004688	J05892	E5	'0340
D	Deputy Administrator	Deputy Administrator	'00000374	J06673	ES	'0340
E	Environment Fish & Wildlife	Senior Vice President, Environment, Fish and Wildlife	'00000078	J00078	ES	'0340
F	Finance	Executive VP and Chief Financial Officer	'00002385	J03325	ES	'0340
J	Information Technology	Executive VP, Information Technology & CIO	'00000082	J07086	E5	'2210
K	Chief Operating Officer	Chief Operating Officer	'00000189	J00189	ES	'0340
L	Office of General Counsel	Executive VP and General Counsel	'00001315	J03266	ES	'0905
N	Chief Administrative Office	Chief Administrative Officer	'00002174	J05885	ES	'0340
P	Power Services	Senior Vice President for Power Services	'00001177	J01177	ES	'0340
T	Transmission Services	Senior Vice President for Transmission Services	'00001065	J05989	ES	'0850

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